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ABSTRACT

The overall effectiveness of the Title I program is questionable, according to this report to Congress. Title I of the Elementary and Secondary Education Act authorizes federal financial assistance for programs designed to meet the special educational needs of educationally deprived children living in areas with high concentrations of children from low-income families. In spite of recent criticism of reading achievement tests, the Office of Education believes it is fair to regard change in reading achievement as the best indicator of program effectiveness because most of the objective evidence from state educational agencies and local educational agencies is from reading test scores. Two recent OE funded studies, which attempted to synthesize the findings from local, state, and federal evaluations, concluded that a positive program impact was evidenced in a few states and in scattered projects in other states. However, because there were no accepted criteria for determining what constitutes a successful program, it was not concluded whether the overall program was successful. (RB)

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REPORT TO THE CONGRESS

BY THE COMPTROLLER GENERAL OF THE UNITED STATES

Assessment Of Reading Activities Funded Under The Federal Program Of Aid For Educationally Deprived Children

Office of Education

Department of Health, Education, and Welfare

The Office of Education has not required adequate information on student achievement from State and local educational agencies for measuring the national effect of reading projects funded under the program. The evaluations made generally have not contained uniform data and often have been incomplete.

This report also discusses areas of program operation and administration requiring special attention by program management officials to help insure that funded projects have the maximum impact on educationally deprived children.

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DEC. 12. 1975

COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-164031(1)

To the President of the Senate and the
Speaker of the House of Representatives

In this report we assess reading activities funded under the Federal program of aid for educationally deprived children and suggest ways to improve program administration. The program is administered by the Office of Education, Department of Health, Education, and Welfare.

Because of the magnitude of Federal funds spent on reading activities and the flexibility allowed States in administering the program, we have tried to determine (1) its effectiveness in meeting students' reading needs and (2) the quality of its administration.

We made our review pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

We are sending copies of this report to the Director, Office of Management and Budget, and the Secretary of Health, Education, and Welfare.

Comptroller General
of the United States

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ABBREVIATIONS

GAO	General Accounting Office
HEW	Department of Health, Education, and Welfare
LEA	local educational agency
OE	Office of Education
SEA	State educational agency

COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

ASSESSMENT OF READING ACTIVITIES FUNDED UNDER THE FEDERAL PROGRAM OF AID FOR EDUCATIONALLY DEPRIVED CHILDREN

Office of Education
Department of Health, Education, and Welfare

D I G E S T

Title I of the Elementary and Secondary Education Act authorizes Federal financial assistance for programs designed to meet the special educational needs of educationally deprived children living in areas with high concentrations of children from low-income families.

The Department of Health, Education, and Welfare's (HEW's) Office of Education is responsible for administering the program at the national level. Each State's educational agency is responsible at the State level and local educational agencies are responsible for developing and conducting the special educational programs. (See pp. 1 and 2.)

Program activities have varied but emphasis has been on developing reading skills. (See p. 2.)

GAO reviewed special reading projects of 15 local agencies in 14 States (see p. 5) and found problems with the evaluation and administration of these projects.

GAO is recommending to the Secretary of HEW that the Office of Education be directed to:

--Include in the uniform reporting system to be implemented pursuant to the Education Amendments of 1974 information on (1) how many students are achieving at, below, and above grade level and (2) whether former title I students are retaining the gains made while in the program. (See p. 16.)

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--Encourage State agencies to strengthen their monitoring of title I projects. (See p. 16.)

--Give special attention to any problems local agencies have in making and documenting needs assessments. (See p. 20.)

--Emphasize to State agencies the need for local agencies to document their bases for selecting program participants. (See p. 27.)

--Clarify its policy regarding serving the most educationally deprived as it relates to selection and retention of student participants. (See p. 27.)

--Work closer with State and local agencies to help insure that program services are concentrated on educationally deprived children and that quality training and technical assistance are provided to program personnel. (See p. 30.)

--Develop a plan for disseminating information on exemplary activities and assist State and local agencies in establishing or improving their dissemination systems by giving them additional guidance and training. (See p. 35.)

--Continue to encourage State agencies to monitor the parental involvement efforts of local agencies and, where necessary, assist them in increasing involvement. (See p. 39.)

HEW agreed with GAO's recommendations.

GAO's recommendations were prompted by the following problems at the State and local levels:

--Although each local agency reviewed reported some reading improvement for the students sampled, available achievement data showed that most students were (1) not reading at levels sufficient for them to begin to close the gap between their

reading level and the national norm, (2) widening the gap in their reading levels, or (3) not retaining gains made in title I after they left the program. (See pp. 6 and 7.)

--Fifty percent of the students' annual reading achievement rates were higher during participation in the program than before. Available data for making this determination was limited, however. (See p. 8.)

--The Office of Education has not required adequate information from State and local agencies for measuring the national impact of title I reading projects on improving students' achievement. The evaluations made generally have not contained uniform data and often have been incomplete. (See p. 12.)

--Some State agencies needed to improve their monitoring of title I projects. (See p. 14.)

--Some local agencies did not make and adequately document comprehensive assessments of the educationally deprived children's needs. (See p. 17.)

--Generally the local agencies' bases for selecting program participants were not adequately documented, some were not serving the most educationally deprived students, and several were not retaining students in the program until they reached grade level. (See pp. 22 and 25.)

--Some local agencies could have improved their title I reading services by concentrating them on educationally deprived children or by providing adequate inservice training to title I teachers and aides. (See pp. 28 and 29.)

--The Office of Education had not yet developed a systematic plan for disseminating information about exemplary title I projects. Also, none of the local agencies and only a few of the State agencies had formal dissemination systems. (See pp. 32 and 33.)

--Almost all of the local agencies needed to increase parental involvement in their projects. (See p. 36.)

Although GAO believes the above problems are applicable to many title I projects, its findings and conclusions are not necessarily typical of all title I projects. (See pp. 5 and 12.)

CHAPTER 1

INTRODUCTION

Title I of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 241a) authorizes Federal financial assistance for programs designed to meet the special educational needs of educationally deprived children living in areas with high concentrations of children from low-income families. The Federal funds are provided to State educational agencies (SEAs) which make grants to local educational agencies (LEAs). On the average, about $1.8 billion was appropriated for the title I program for each of fiscal years 1973-75.

Title I regulations define "educationally deprived children" as children who need special educational assistance to perform at grade levels appropriate for their ages. The term includes children with special educational needs due to poverty, neglect, delinquency, and handicaps or to cultural, economic, and linguistic isolation from the general community.

The Office of Education (OE), Department of Health, Education, and Welfare (HEW), administers the program at the national level. OE guidelines state that, as with any group of children, educationally deprived children differ from one another but they also have certain common characteristics. For example, they are often characterized by a lack of response to conventional classroom approaches, inadequate performance in communication skills, physical defects, low aspirations, poor school attendance, and a high failure rate. Projects designed to overcome these problems have included health care and preschool projects, remedial and enrichment classes, and services of speech and hearing specialists and social workers. According to OE guidelines the project should be designed to give reasonable promise of success in meeting the children's special needs.

According to the most recent OE statistics, of the 6.7 million educationally deprived children who participated in the title I program in school year 1970-71, about 55 percent were white, 36 percent were black, 6 percent were Mexican-American, and 3 percent were members of other ethnic groups.

Title I funds have been used principally to provide instructional services for educationally deprived children. During the 1972-73 school year and the 1973 summer school term, about 66 percent of the total title I expenditures by LEAs were for this purpose. Basic skill development in reading has been the most widely used instructional

service. OE statistics show that, for the same period, about $474 million, or 37 percent of title I expenditures, was used to improve children's reading ability. More recent statistics were not available.

PROGRAM ADMINISTRATION

OE develops regulations and guidelines for administering the title I program and provides consulting service to SEAs.

OE is revising the title I regulations to clarify them and to incorporate program changes made by the Education Amendments of 1974 (Public Law 93-380). According to an OE official, the regulations applicable to activities financed by grants to LEAs are expected to be published about January 1976. To participate in the program, States are required to submit applications to OE for review and approval. The SEA is required to insure that it will administer the program and submit reports in accordance with the act and OE title I program regulations.

SEAs' major responsibilities are to

--approve or disapprove project applications submitted by LEAs after determining whether the projects are designed to comply with the intent of title I,

--insure that title I funds are used only for approved projects, and

--adopt fiscal control and accounting procedures to insure that Federal funds received from OE are properly disbursed and accounted for.

The act authorizes payments to a State to defray its cost of administering the program and of providing technical assistance to LEAs. These payments may not exceed 1 percent of the total grants to a State for any fiscal year or $150,000, whichever is greater.

LEAs, which administer public education up to and including grade 12 in a county, township, or other school district, are responsible for developing and implementing title I programs. The term "program" refers to all the projects which an LEA proposes under title I. The program may consist of one or more projects, and each project is generally subdivided into project activities.

LEAs are responsible for determining school areas eligible for participation, identifying the educationally deprived children in these areas, determining the special needs of such children, developing projects responsive to the priority needs of these children, adopting procedures for evaluating the effectiveness of major project activitives, submitting applications to SEAs for grants, and carrying out the projects in accordance with their approved applications and OE regulations.

Children in private schools are to be given an opportunity to participate in the title I program on the same bases as public school children. LEAs are to maintain administrative direction and control over title I activities conducted in private schools.

PROGRAM PARTICIPATION

The following table, prepared from statistics at SEAs and LEAs reviewed, shows the amount of title I funds available for school year 1972-73, the amount allocated for reading activities, the number of children who participated in reading activities, and a percentage breakdown of that number by ethnic group.

LEA	School year 1972-73 funding: Total title I	School year 1972-73 funding: Reading activities	Children participating in reading activities: Total	Percent of total by ethnic group: White	Black	Mexican-American	Indian	Other
Los Angeles City Unified School District, Los Angeles, Calif.	$29,000,000	$18,700,000	a/101,830	-	-	-	-	-
Dallas Independent School District, Dallas, Tex.	3,143,000	1,756,000	21,277	5	83	12	-	-
The School District of Kansas City, Mo.	2,458,000	972,000	b/8,022	-	-	-	-	-
Chester Upland School District, Chester, Pa.	1,129,000	254,000	1,967	20	72	4	-	4
Anne Arundel County Public Schools, Annapolis, Md.	773,000	773,000	2,000	46	54	-	-	-
Haywood County Schools, Brownsville, Tenn.	694,000	355,000	2,326	23	77	-	-	-
Bossier Parish School Board, Benton, La.	428,000	98,000	1,435	7	93	-	-	-
Todd County Independent School District, Mission, S. Dak.	190,000	72,000	392	12	-	-	88	-
Department of Education, Lincoln County, Brookhaven, Miss.	144,000	97,000	651	52	48	-	-	-
Winslow Elementary District No. 1, Winslow, Ariz.	121,000	121,000	401	12	11	37	40	-
Adams County School District No. 1, Denver, Colo.	114,000	99,000	375	56	8	33	2	1
Santa Paula School District, Santa Paula, Calif.	78,000	34,000	275	15	1	84	-	-
Independent School District No. 279, Osseo, Minn.	72,000	43,000	c/389	-	-	-	-	-
Lake Forest School District, Harrington, Del.	63,000	63,000	230	57	43	-	-	-
Bismarck Public School District No. 1, Bismarck, N. Dak.	61,000	42,000	243	85	-	-	14	1
Total	$38,468,000	$23,479,000	141,813					

a/A breakdown by ethnic groups was not available. Total enrollment for the 3 public schools we visited was 3,633, of which 2 percent were white, 43 percent were black, 51 percent were Mexican-American, and 4 percent were other ethnic groups.

b/A breakdown by ethnic groups was not available.

c/A breakdown by ethnic groups was not available. Total 1971-72 enrollment was 182, of which 89 percent were white, 2 percent were black, 3 percent were Mexican-American, 3 percent were Indian, and 3 percent were other ethnic groups.

SCOPE OF REVIEW

We made our review at OE headquarters, Washington, D.C.; 7 HEW regional offices; 15 LEAs in 14 States; and the SEAs in these States. The States and LEAs were selected to give reasonable geographical coverage of the Nation and reasonable coverage of both urban and rural projects with different ethnic characteristics. Although they were selected judgmentally, we believe that the results of our review apply to many title I projects. Our findings and conclusions are not, however, necessarily typical of all title I projects. The review was directed primarily at those areas of program operation and administration that affected the effectiveness of title I reading activities in fiscal year 1973.

We examined legislation, Federal regulations, OE program policies and directives, project applications, reports, and other documents relating to the title I program. We interviewed parents and teachers and officials having responsibilities for the program. We also visited classrooms to observe title I reading activities.

CHAPTER 2

EFFECTIVENESS AND EVALUATION OF READING PROJECTS

The reading achievement goals for the projects we reviewed varied widely; however, most were set below the national goal of the title I program. Although each LEA reported some reading improvement for the students in our sample, most of the students were not reading at levels sufficient for them to begin to close the gap between their reading level and the national norm. The gap between the achievement level of the educationally deprived children and that of average children of the same age generally increased while the students were in the program. The annual reading achievement rate for 50 percent of those students on which data was available was higher during participation in the program than before. Moreover, most students reading at or above grade level when last tested in title I did not retain these gains after leaving the program.

OE has not required adequate information from SEAs and LEAs for measuring the national impact of title I reading projects on improving students' achievement. LEAs' evaluations, which form the basis for SEA evaluation reports sent to OE, generally have not contained uniform data and often have been incomplete. This lack of uniformity has resulted primarily because OE has not developed a definite method for LEAs and SEAs to follow in gathering, evaluating, and reporting program progress data.

Monitoring of title I projects by some SEAs needed improvement to enable them to better determine project strengths and weaknesses.

PROGRAM GOALS

According to OE, the national goal of the title I program is to close the educational gap between the achievement level of an educationally deprived child and that of an average child of the same age (the national norm). OE headquarters officials said that, although it is an ideal to strive for, a title I program can be successful without the students closing the educational gap. Because it is title I policy to serve the most educationally deprived students, they said that it is unreasonable to expect all of these students to reach this goal. Also, students who achieve the goal probably take more than 1 year to do so. However, the officials said that the achievement rate of the vast majority of students receiving title I educational services should be higher than before program exposure, although they did not know

how much higher. To close the educational gap, the educationally deprived child must achieve at a greater rate than the average child; that is, more than 1 year for each year in class until the child reaches his or her grade level. Officials in about two-thirds of the SEAs and LEAs believed that many of their students were not capable of doing this and that such students would always remain below the national norm.

Reading achievement goals set by the 15 LEAs we reviewed varied considerably. Two set goals of more than 1 year's gain for each year in class; seven set goals of 0.7 to 1 year; and the remaining six set lower, multiple, or immeasurable goals. According to OE, the educationally deprived child achieves an average of about 0.7 of a year's growth for each year in class without the benefit of a compensatory education program, such as title I.

RESULTS OF READING PROJECTS

To review student reading achievement, we examined records for school year 1972-73 at 14 of the 15 LEAs; records at 1 LEA were inadequate. The student records were randomly selected from among all students participating in reading projects, except three LEAs had such good records that we were able to review all participating students' records. In total, we reviewed 1,481 student records at 59 schools.

Students' reading gaps vary in relation to reading achievement as follows:

Achieved at rate	Gap is being
Greater than 1	Closed
Of 1	Maintained
Less than 1	Widened

Our analyses of the student records showed that most students were not closing the gap or even maintaining it, as shown below:

Achieved at rate	Students	Percent
Greater than 1	500	34
Of 1	98	6
Less than 1	883	60
Total	1,481	100

The following table shows achievement data for each of the 14 LEAs.

LEA	Number of student records examined	Number of students achieving a rate			Student gain (note a)	
		Greater than 1 a year	Of 1 a year	Less than 1 a year	Mean (note b)	Median (note c)
1	249	76	30	143	1.0	0.7
2	189	99	11	79	1.1	1.1
3	154	48	8	98	0.7	0.7
4	100	50	11	39	1.1	1.1
5	99	14	3	82	0.5	0.4
6	97	27	3	67	0.6	0.5
7	96	33	5	58	0.8	0.8
8	93	18	3	72	0.3	0.2
9	87	31	6	50	0.8	0.8
10	73	23	2	48	0.7	0.5
11	67	16	7	44	0.8	0.8
12	66	13	2	51	0.5	0.6
13	60	24	3	33	0.9	0.8
14	51	28	4	19	1.2	1.2
Total	1,481	500	98	883	0.8	0.8

a/Students' achievement is determined by taking the difference between their pretest and posttest scores, the method used by the LEAs to develop the statistics they report to the SEAs. Caution should be taken in comparing the achievement data between LEAs because the time intervals among the tests have varied considerably.

b/Mean is the arithmetic average stated in terms of years of reading gain.

c/Median is the midpoint in the years of reading achievement.

The reading achievement goals at four LEAs could not be measured by our achievement indicator (total reading achievement) because they were not stated in measurable terms or were related to achievement factors other than total reading. Of the remaining 10 LEAs, only 1 was achieving its goal.

Only seven LEAs had data which enabled us to compare students' average annual reading achievement before entering the program with their achievement while in the program. Our analysis showed that the annual reading achievement rate of 50 percent of the students was higher during participation in the program than before, as follows:

Achievement	Students	Percent
Higher	161	50
Same	2	1
Lower	158	49
Total	321	100

Although these statistics may appear inconsistent with those regarding the reading gap discussed on page 7, they are not. A student's educational gap widens if the student achieves at a rate of less than 1 even though this rate, while in title I, may be higher than the student's achievement rate before entering title I.

Only nine LEAs had data on how students had done in reading after leaving the program, as follows:

Reading status when last tested while in title I	Students	Percent
At or above grade level	84	30
Below grade level	194	70
Total	278	100

Those students reading at or above grade level, when last tested in the program, generally regressed after leaving the program, as shown below.

Subsequent reading status	Students	Percent
At or above grade level	37	44
Below grade level	47	56
Total	84	100

Of those students reading below grade level when last tested in the program, almost all remained so after leaving the program.

Subsequent reading status	Students	Percent
At or above grade level	19	10
Below grade level	175	90
Total	194	100

Despite these results, personnel at all the LEAs generally thought the title I reading activities had been successful. Some of the reasons given were:

--Students' reading levels increased and their self-concepts improved.

--Students had a greater desire to participate in class and a more positive attitude toward school.

--Students had more interest in reading than they did before entering the program.

--Parents had a more hopeful attitude toward their children's education, resulting in more parental involvement.

PROGRAM EFFECTIVENESS

The overall effectiveness of the title I program is debatable. The Commissioner-Designate of Education, in his fiscal year 1972 annual report to the Congress, said:

> "As for the academic effectiveness of the program, there are no representative, nationwide statistics on the progress of Title I children. Some local and State evaluation reports * * * indicate that measurable progress has been made, particularly in reading and mathematics."

In March 1973 testimony before the Subcommittee on Departments of Labor and Health, Education, and Welfare Appropriations, House Committee on Appropriations, the Assistant Secretary for Education--formerly the Commissioner of Education--said:

> "I would have to say at the present stage, after 7 years of title I, while many good things can be said about it in terms of attitudes of teachers, parents, and in some cases of children, the bottom line does not show very much. In other words, the measurable conditions * * * do not make a strong case yet for saying the $8 or $9 billion which have gone broadly to the disadvantaged have yet made a sweeping difference."

In a 1974 statement to the same Subcommittee, OE said that, although studies of title I projects had been unable to show the program's effectiveness in raising the achievement levels of disadvantaged children, several SEAs and LEAs had reported gains in students' basic skills.

Reading achievement tests have been criticized for several reasons including their not being designed to accurately test minorities or extremely high or low achievers. In view of this, however, OE believes it is fair to regard change in reading achievement as the best indicator of program effectiveness because most of the objective evidence from SEAs and LEAs is reading test scores. Two recent

OE-funded studies, which attempted to synthesize the findings from local, State, and Federal evaluations, concluded that a positive program impact was evidenced in a few States and in scattered projects in other States. The studies also concluded that generally there was no evidence of program failure in other States and communities; rather, there was no evidence at all or the evidence was not presented persuasively. Both studies' conclusions were based on achievement scores in basic skills, especially reading, and were heavily qualified.

A large-scale OE-financed study of the impact of compensatory reading programs on the development of reading skills in elementary schools could provide national evidence of achievement. This ongoing study is expected to be completed about December 1975.

At the seven HEW regional offices we visited, officials said the overall title I program had been successful, citing as examples:

--The increased resources provided by the program had enabled LEAs to provide concentrated services to educationally disadvantaged children.

--The number of State reports showing average statewide gains of students above 0.7 of a year's growth increased from 52 percent in fiscal year 1971 to 81 percent in fiscal year 1972.

SEA officials generally believed that title I reading activities had been successful. Some of the reasons they gave were:

--More than 50 percent of the participants gained above the national average.

--Many children returned each year to regular school programs because they no longer needed title I services.

--Evaluations have consistently shown average statewide gains of approximately 0.9 of a year's growth for each year of instruction.

Educators differ as to what constitutes a successful compensatory education program. However, they generally agree that a successful program should ultimately result in a child's achieving proficiency appropriate for the average child of the same age. Some educators think that

initially it is enough to have children achieve more than they did before entering the program, while others feel a program is not successful unless children gain at least a year for each year in class. Whether a child behind grade level will achieve at grade level depends on many factors such as how far behind the child is when entering a remedial program and the quantity and quality of instruction received.

IMPROVEMENT NEEDED IN TITLE I ACCOUNTABILITY

OE needs to improve its management of the title I program, particularly its evaluations, to provide greater accountability to the public and the Congress and to improve program effectiveness. Specifically, LEAs' evaluations need to be more consistent and comprehensive. We believe these problems occur primarily because OE has not developed a definite method for LEAs and SEAs to use in gathering, evaluating, and reporting program results. Also, the SEAs need to improve their monitoring efforts so that they will have more information for evaluating the quality of title I reading activities.

Chapters 3 and 4 discuss the problems of assessing children's needs and of selecting children to receive project services, respectively. Besides needing correction to improve project performance, these problems also influence the quality of LEAs' evaluations.

LEAs' evaluations

LEAs are required to evaluate the effectiveness of their title I programs at least annually and to report the results to their SEAs which, in turn, must annually report their evaluations to OE. OE is to use the SEA and LEA reports to prepare evaluations of program results at the national level.

The LEAs' reading evaluations generally lacked uniformity and often were incomplete because

--different test series were used,

--the frequency of giving reading achievement tests differed, and

--longitudinal evaluations were seldom made.

Reading achievement tests are developed and marketed as part of integrated test series designed to test children at various grade levels. Each series has its unique characteristics. The 15 LEAs used 16 different test series, and 11 used different test series between both grades and years. The nine SEAs which responded to our question on whether they were having problems in making statewide evaluations indicated that they were and attributed this, in part, to inconsistent testing in their States. As a result, the SEAs, and ultimately OE, have not been able to consolidate test data to get meaningful results.

To compare the results of different reading achievement tests, OE contracted for a study, referred to as the Anchor Test Study. The study, completed in September 1974, provides for translating--for the first time--a child's score on any one of the eight most widely used standardized reading tests into an equivalent score on any of the other tests. Tables for this purpose were prepared for testing children in grades 4, 5, and 6. Nationally representative individual and school norms also were developed for each test.

Although the score equivalents are available only for certain grades and tests, their use should improve Federal and State evaluations of title I projects. LEAs should also find the equivalents useful in converting test scores for new or transfer students to the test scores normally used in their schools.

Besides using different test series, the LEAs gave reading achievement tests at different intervals. Of the 15 LEAs, 9 gave reading tests during the fall and spring and 6 gave them during the spring only. Because the time periods for giving tests varied, it was difficult for the SEAs and OE to compare and consolidate the results of title I reading activities.

Further, LEAs have seldom made longitudinal evaluations, which measure the progress of children over more than a year. According to an OE official, only two or three States have made such evaluations. Of the 15 LEAs reviewed, 3 made longitudinal evaluations. SEA and LEA officials' reasons for not making such evaluations were lack of comparable data, staff, and expertise; no requirement to do so; and student mobility.

To make longitudinal evaluations, testing must be consistent. As a result of the Anchor Test, which permits reconciliation of different test results, LEAs now can make

longitudinal evaluations of some students even if the testing has not been consistent. Accordingly, in the future, LEAs should be in a better position to evaluate their programs over a longer time period. From this data, the long-term impact, including retention of gains after leaving the program, could be measured.

Improved State monitoring needed

SEAs are responsible for monitoring title I projects to help improve their administration and operation. The effectiveness of the title I projects we reviewed could be increased if the SEAs improved their monitoring systems to gather and report more useful data for project administration and operation.

Four of the 14 SEAs visited had no formal systems for monitoring title I projects. One SEA official told us that the SEA had no monitoring teams and that, because of a lack of funds, only those projects indicating that they had serious problems were monitored. The official said he would like to see a large increase in the frequency and quality of SEA monitoring. At another SEA the monitoring procedures were informal and written reports on visits to the LEAs were not made.

The SEAs' monitoring visits generally were not long enough to permit an indepth review of title I program operations in target area schools. For example, 1 SEA's monitoring visits ranged from one-third of a day for 1 staff member at an LEA with 1 school to 2 or 3 days for 4 staff members at an LEA with 14 elementary schools. With such limited time, most of the monitoring team's time was spent in meetings and discussions with LEA officials and school principals; little or no time was spent in school classrooms observing the quality of title I services. One LEA official told us that its SEA's annual monitoring visits had been superficial reviews and that he would welcome indepth reviews involving classroom observations and discussions with teachers, aides, and counselors.

Legislative action taken to improve title I evaluations

The Congress recognized that the title I provisions relating to evaluations did not result in the kinds of information anticipated and that OE had not assumed the leadership it should in this regard. Therefore, by enacting the Education Amendments of 1974 on August 21, 1974, the Congress amended title I to require the Commissioner of Education to:

--Develop and publish standards for evaluating program or project effectiveness in achieving the objectives of title I.

--Provide to SEAs and LEAs models, including uniform procedures and criteria, for evaluating all programs conducted under title I.

--Provide technical and other assistance necessary to enable SEAs to assist LEAs in developing and applying systematic evaluations of programs in accordance with the models developed.

--Specify, for the models developed, objective criteria for evaluating all programs and outline techniques (such as longitudinal studies) and methodology (such as tests which yield comparable results) for producing comparable data on a statewide and nationwide basis.

CONCLUSIONS

Because there are no uniformly accepted criteria for determining what constitutes a successful program, we did not attempt to conclude whether the projects had been successful. Our analyses of available achievement data showed that:

--Only 1 of the 10 LEAs having measurable goals was achieving its goal.

--Most title I students were (1) not reading at levels sufficient for them to begin to close the gap between their reading level and the national norm, (2) widening their gap in reading levels, or (3) not retaining title I gains after they left.

Whether the results at 14 LEAs are indicative of national results is unknown because OE has not developed an adequate evaluation system to obtain such knowledge. The new evaluation provisions mandated by the Education Amendments of 1974, assuming that their implementation will result in useful evaluation reports, should provide the public, the Congress, and program managers at Federal, State, and local levels with better data on program results.

The SEAs we reviewed need to establish monitoring systems, formalize existing systems, or conduct more indepth reviews during monitoring visits if these visits are to be useful in evaluating LEA performance.

RECOMMENDATIONS TO THE SECRETARY OF HEW

The Secretary should direct OE, in implementing the new program evaluation provisions mandated by the Education Amendments of 1974, to include in the uniform reporting system information on (1) how many students are achieving at, below, and above grade level and (2) whether a sample of former title I students are retaining the gains made while in the program.

The Secretary should also direct OE to make a concerted effort to get SEAs, where necessary, to strengthen their monitoring of title I projects to enable them to better determine project strengths and weaknesses.

AGENCY COMMENTS

HEW, by letter dated August 5, 1975 (see app. I), concurred in our recommendations and said that:

--A reporting format, being developed for use at local and State levels, will provide annual information on the number of participants who are achieving at, below, or above the level appropriate for their ages.

--A national study to determine the long-term effects of compensatory education programs, including title I, on participants was begun on July 1, 1975. As this study progresses, the feasibility of including information in the reporting system on whether a sample of former title I students are retaining the gains made while in the program will be examined.

--Annual program reviews of each State's title I administration include a critique of the monitoring done by the SEA. This procedure will be continued along with the practice of, both verbally and in writing, assessing the effectiveness of the State's effort in the areas observed, recommending modifications where necessary, and requesting the State to communicate the action it takes or plans to take to implement recommendations.

CHAPTER 3

IMPROVEMENTS NEEDED IN ASSESSING EDUCATIONAL NEEDS

The objective of the title I program is to provide supplementary educational services responsive to the academic, behavioral, or physical needs of educationally deprived children. To help achieve this objective, LEAs are responsible for developing a list of needs in order of priority, including information on the incidence and severity of the needs, and for documenting the bases for the priorities. OE guidelines provide that the needs be determined by consulting with teachers, parents, private school authorities, and representatives of other agencies having genuine and continuing interest in the children.

Although the LEAs had identified certain general educational needs of children, some neither assessed the variety, incidence, or severity of the needs nor documented the evidence used to establish the needs. Without documented needs assessments, program managers do not have a proper basis for evaluating LEAs' efforts to meet children's needs.

Our evaluation of the needs assessment process did not focus entirely on reading because the process relates to other educational areas.

QUALITY OF NEEDS ASSESSMENTS

The LEAs used a wide variety of approaches in assessing needs. Some LEAs relied only on objective data, such as the results of standardized tests; some only on subjective data, such as teachers' and parents' opinions; and some on both.

In one State, LEAs were not required to assess needs because the SEA had mandated six specific academic and supportive components which each LEA was to have in its title I project. As a result, the LEAs did not assess the six components, one of which was reading. The rationale for this policy, according to a State official, was that the exemplary projects in the State seemed to have these components. This policy was rescinded for the 1973-74 school year; the LEAs were not required to include all six components if the results of a comprehensive needs assessment indicated they were not needed. The policy was changed primarily because OE believed that it did not allow LEAs enough flexibility to design projects tailored to their needs.

An LEA in another State focused its needs assessment only on academic areas because it felt that, since there was insufficient money to meet instructional needs, it should give noninstructional needs very low priority.

The project director of another LEA believed the needs assessment had been inadequate in special needs, such as emotional, mental, speaking, and hearing handicaps, because of the lack of trained personnel to work in these areas. At another project, officials believed their assessment was not comprehensive because they did not identify the priority educational needs, or the factors contributing to these needs, of individual target children.

At many LEAs, parents of title I children, teachers, private school officials, or representatives of community organizations who knew the needs of these children were not involved or were involved only to a limited extent in the assessments. For example, at one LEA only classroom teachers and school principals were consulted; at another only the homeroom teacher had an input.

Although OE has stressed the importance of assessing needs, officials at six LEAs and five SEAs said they had received insufficient guidance from OE or the SEAs on how to make and document needs assessments. Some examples follow.

--One LEA official believed the SEA or OE should provide detailed criteria for determining needs. He said that, because such criteria are not available, each LEA must develop its own.

--A State title I coordinator said it was difficult to provide information on needs assessments to LEAs because no prescribed methodology for assessing needs exists. He believed that an OE-sponsored workshop with a simulated needs assessment would be beneficial.

--An official at another SEA said that, as a result of OE's fiscal year 1973 program review, OE officials told the SEA that needs assessments too often were left to the highly variable and subjective observations of classroom teachers. The SEA later asked OE for specific guidance on the matter but received none.

Some LEAs and SEAs considered the guidance they received adequate. For example, one LEA official said the SEA had given the LEA detailed guidelines and had recommended forms for assessing needs. As a result, teachers

and administrators were more aware of the characteristics to be considered in providing an instructional program to meet the needs of individual students. In another State an SEA consultant said OE programs had made the State aware of a need for procedures for assessing needs, which had helped to steadily improve the assessments.

Five LEAs needed to improve the documentation in support of their assessments. For example, one LEA determined the needs of its children on the basis of observations and discussions with classroom teachers, principals, and administrative officials but did not keep records of these activities. None of the 15 LEAs kept records on the needs of individual children. Without adequate documentation, the LEAs lacked valuable data which, in our opinion, could help them better design and evaluate their projects.

OE ACTIONS TO IMPROVE NEEDS ASSESSMENTS

In the fall of 1972, to help LEAs improve program administration, OE distributed guidelines covering major facets of the title I program, including needs assessments. The guidelines, however, were too late to help the LEAs in assessing needs for school year 1972-73, the year covered by our review.

The guidelines describe in general terms the steps LEAs should follow in assessing needs. First, certain key indicators, such as achievement records, reading levels, standardized tests, and teachers' judgments, are to be used to identify the educationally deprived children in the eligible attendance areas. Next, data is to be collected on the individual needs of these children. OE considers it advisable to develop student profiles which identify the needs of individual students. These profiles are then to be summarized so that cognitive, affective, health, and welfare needs of groups of students become apparent and so that components of a comprehensive program can be identified.

According to OE, other resources are to be considered to insure that title I funds are not spent to meet needs which can be met in some other way. Priorities among the needs are then to be set, with top priority given to the most widespread and critical need. Next, program objectives are to be developed on the basis of performance criteria. Program design is to follow from the objectives by using the best means to achieve the desired change in student performance.

An OE official told us that in the fall of 1974 OE asked all SEAs to identify exemplary title I activities in four areas, one of which was needs assessment. Information about these activities was to be distributed to SEAs and LEAs at three national title I meetings, the first of which was held October 15, 1975. (See p. 31 for a discussion of OE's responsibility for disseminating information on exemplary activities.)

CONCLUSIONS

Some LEAs did not make or adequately document comprehensive needs assessments. Many did not involve teachers, parents, private school officials, or community representatives in their assessments or involved these individuals only to a limited extent. Without adequate documentation of needs assessments, it is difficult to evaluate the responsiveness of the title I program to the priority needs of participating children.

OE distributed a guidance package which, if properly implemented, should help improve the quality of needs assessments. However, because of past weaknesses in needs assessments, OE should actively monitor its implementation. The SEAs should also closely monitor LEAs' assessments, including the extent to which all concerned parties are involved.

RECOMMENDATION TO THE SECRETARY OF HEW

The Secretary should direct OE to give special attention during its State program reviews to any problems that the LEAs have in making and documenting needs assessments.

AGENCY COMMENTS

HEW concurred in our recommendation. It said that OE can respond to specific problems of LEAs only in and through the SEA which is responsible for title I administration. Many such requests are made each year and are responded to as appropriate in each case. Under its State Information Sharing project, OE is gathering information on exemplary needs assessment components from local title I projects in 14 States. Information on these projects, which were selected by the SEAs, will be disseminated nationally next year as part of OE's continuing effort to give technical assistance to SEAs and LEAs.

HEW also said that the proposed new title I regulations (expected to be published about January 1976) will outline the procedures to be used in documenting the educational needs of children more specifically than the current regulations. Thus, SEAs will have clearer guidance on what information to require LEAs to provide in support of their needs assessments, and OE review teams will be able to focus on both the State's implementation of the regulations as well as offering technical assistance to States and LEAs through use of the exemplary components.

CHAPTER 4

IMPROVEMENTS NEEDED IN SELECTING PROGRAM PARTICIPANTS

Accurately identifying and selecting children to participate in the title I program and retaining them in the program until they reach grade level is essential to insure that services are provided to those children whom title I is intended to serve. Generally the LEAs' bases for selecting program participants were not adequately documented, which sometimes made it impossible to determine if the participants were eligible. Some LEAs provided title I services to non-educationally deprived children or to children who were not the most educationally deprived. Also several LEAs did not retain children in the program until they reached a reading level equal to their grade level.

A fundamental difference in interpretation of the program requirement to serve the most educationally deprived students exists among LEAs. One interpretation is that as long as a student is among the most educationally deprived when entering the program he or she can be retained in the program until reaching grade level. Another interpretation is that a student has to remain among the most educationally deprived to be retained in the program; otherwise, he or she will be replaced by a student who is more educationally deprived.

SELECTION OF PARTICIPANTS

OE regulations require that LEAs select the most educationally deprived children for title I projects. Allowed to develop their own selection methods, LEAs adopted various methods which, in some instances, provided little assurance that the most educationally deprived children were selected. Adding to this problem was the inadequate documentation of LEAs' selection criteria. This precluded any objective evaluation of whether only eligible children were selected.

The selection methods used by the 15 LEAs we visited can be grouped into 3 categories:

--Four used only objective data and required that standardized achievement tests be used to identify children reading below their grade levels. One of these adopted a "saturation" policy whereby all students in a school area were served.

--Two used only subjective data, such as teachers' recommendations.

--Nine used a combination of objective and subjective information, such as test scores, diagnosed learning or physical disabilities, teachers' and principals' judgments, and school attendance data.

Examples of problems in selecting students follow.

One school selected students for reasons other than low reading proficiency. Of 25 students' test scores in our sample, 12 were ineligible on the basis of the LEA's criterion of reading more than 1 year below grade level. School officials said that homeroom teachers had selected participants and that these teachers had used title I as a "dumping ground" for disciplinary cases, hyperactive students, and other students who otherwise were not eligible for title I. For example, one fifth-grade student, whose test score showed him to be reading 6 months below grade level, was recommended by his homeroom teacher for remedial reading in the hope that this would cure his hyperactivity.

Test scores of all students not enrolled in title I reading at this school showed that 32 read at more than 1 year below grade level, with the reading gap ranging from 1.1 to 2.8 years. According to school officials, some of these students were not recommended for remedial reading either because the teachers or the parents considered it degrading or because the homeroom teachers did not believe they needed it. Several other LEAs had emphasized subjective information over available objective data in selecting title I reading participants.

SEA and LEA officials differed on the importance of objective versus subjective information in selecting participants. Some officials said the use of objective data, such as standardized achievement test results, was necessary for selecting participants with reasonable accuracy. Other officials said that, because achievement tests were not infallible and might be misleading, the judgments of teachers and other school personnel should be relied on.

Another LEA selected better readers over poorer readers on the basis of subjective, undocumented data. Its project application included data showing that, of 1,390 students in title I public schools, 406 had reading test scores that ranged from 4 months to 2.5 years below grade level. A total of 365 public school students were selected to participate in the title I reading activity. Considering only objective data, the lowest achievers should have been selected from the 406 students. However, our review of test scores of 73 project participants showed that 28 were not among the

406 lowest achievers. The director of this project said that the LEA had also considered teacher and counselor referrals in selecting participants and that the LEA should have documented its reasons for selecting participants whose scores exceeded the eligibility criteria. Another official of this LEA said that test scores were not always valid when applied to children of different ethnic backgrounds.

The SEA title I director, overseeing this LEA, told us that, because test scores were not infallible, teachers' judgments became an important factor in the final selection of participants and that selection on this basis simply meant that the teachers determined whether the children's achievement levels, based on performance in the classroom, were below average.

At another LEA, entire student populations were served by the title I teaching staffs because of the SEA's saturation policy for certain public elementary schools. The SEA had determined that poverty and manifested educational needs were so intense at some schools that they must be saturated for maximum effectiveness. Accordingly, the SEA directed some LEAs to reduce the number of schools in their title I programs and to serve all students in selected target schools.

SEA officials contended that (1) when standardized tests showed that 70 percent of a population was eligible for the program, it was virtually impossible to exclude the small percentage of ineligible students and (2) the students who have relatively better test scores have some degree of educational deprivation resulting from poverty, neglect, and delinquency or from cultural and linguistic isolation from the general community. At the time of our fieldwork, 20 of the approximately 900 LEAs receiving title I funds in the State were following the saturation policy.

As a result of an OE title I review made in September 1972, OE recommended that the State discontinue the saturation policy. OE's review of student test scores at 15 schools showed that many eligible and seriously educationally deprived children had been denied program benefits and that less deprived students had received them. OE's position is that projects should be established in as many target schools as necessary, consistent with title I regulations, to insure that the most educationally deprived students are served first. During another title I review made in April and May 1975, OE found that both the SEA and the LEA were still following the saturation policy. In its review report to the SEA, dated September 22, 1975, OE recommended that the SEA take immediate steps to correct this situation.

Officials at one LEA in the State said that, in schools with heavy concentrations of low achievers, it is very difficult for the school's staff to arbitrarily distinguish between the needy and the most needy. Some LEA officials disagreed with the concept of serving the lowest achievers first. They believed the limited title I financial resources could be more effectively used if the least educationally deprived children were served first and brought up to their grade levels in reading in a shorter period. Doing this, in their opinion, would permit more time and staff to work with those children, at a later date, who have more serious reading problems. OE, however, maintains that the intent of title I is to concentrate resources on children with the greatest need.

RETENTION OF PARTICIPANTS

Although the intent of title I assistance is to raise participants' levels of educational achievement to those appropriate for children of their age, most of the LEAs reviewed did not continuously give title I services to the children until they reached these levels. The judgments of teachers and other LEA personnel often entered into decisions to release or retain students in title I reading or to reenroll former title I students.

One State recommended that title I students receive services for a minimum of 3 years. At 1 LEA in this State, 38 of 47 second through seventh grade students were dropped from title I reading even though they had not achieved their grade levels.

At another LEA title I participants were removed and replaced at various times during the school year. This was generally done at the discretion of LEA-funded teachers. LEA officials stated that LEA-wide guidelines should be prepared to insure uniformity in selecting, removing, and replacing participants.

At a third LEA, where the title I reading project served grades 1 through 8, students left the project when they were passed to the ninth grade, showed enough improvement to return to a regular classroom situation, or made no progress due to a lack of interest or ability. Students were returned to the project only if their reading achievement regressed.

At a fourth LEA title I students were retained in the reading project until they reached their grade levels and up to 1 school year afterward. The decision to extend title I services to students after they reached grade level was based on the judgments of the title I counselors and the teachers.

LEA officials believed this extension of services was necessary to maintain the children's reading achievement growth and to help alleviate possible regression.

Apparently to serve the most educationally deprived children, another LEA made a new selection of eligible children at the beginning of each school year. As a result, reading services were provided to most title I students for only a year or less and some students were dropped from the program before reaching their grade levels. On the basis of the judgments and recommendations of title I and regular teachers, a student could be removed from the program during the school year or retained for part of a second school year.

As shown in the last two examples, the requirement to serve the most educationally deprived children apparently can be interpreted differently. The interpretation is important because of its impact on the students' chances of achieving the national goal. By interpreting the requirement to mean that a student must be among the most educationally deprived only at the time of entering the program, LEA officials can provide services until the student reaches grade level or is passed to a grade in which title I services are not provided. However, by interpreting the requirement to mean that a student must always be among the most educationally deprived, he or she may be replaced by a student having a greater need before reaching grade level.

CONCLUSIONS

The LEAs could have improved their bases for evaluating title I activities if they had adequately documented the methods used in selecting participants. On the basis of available test data, some LEAs did not serve the most educationally deprived children and some served noneducationally deprived children. In selecting participants, many LEAs considered the recommendations of parents, teachers, and other school officials and on this basis might have been serving the most deprived; however, this could not be determined because of the lack of documentation.

Several of the LEAs did not retain students in title I reading activities until they reached their grade levels. If this practice is widespread, the national goal of closing the educational gap will not be achieved. Moreover, apparently the different interpretations of the program requirement to serve the most educationally deprived children has reduced some students' chances of achieving the national goal. These students were removed from the program because they were no longer among the most educationally deprived rather than being retained until they reached grade level.

RECOMMENDATIONS TO THE SECRETARY OF HEW

The Secretary should direct OE to:

--Emphasize to the SEAs the need for LEAs to document their bases for selecting program participants, to insure that the children whom title I is intended to serve are being served.

--Clarify its policy regarding serving the most educationally deprived as it relates to selecting and retaining students in the program.

AGENCY COMMENTS

HEW concurred in our recommendations and said that:

--The State Information Sharing system will provide States, and through them the LEAs, information on effective needs assessment practices, including the utility of appropriate documentation of the bases for participant selection. Further, it is expected that the new title I regulations will specify the local needs assessment process. In addition, the OE review team will monitor SEA and selected LEA implementation of the needs assessment procedures and will continue to emphasize to SEAs the need for LEAs to document the bases for participant selection.

--OE will continue to work with the SEAs both through annual program reviews and specific technical assistance visits to clarify even further the policy of providing title I services to children identified through educational needs assessment as being in greatest need until such children are achieving at a level appropriate for their age or until they are passed to a grade in which title I services are not available. Also, the policy will be more specifically covered in the new regulations which will be distributed to SEAs by OE and reviewed with LEAs by their SEAs.

CHAPTER 5

IMPROVEMENTS NEEDED IN READING SERVICES

Title I reading services could have been improved at 6 of the 15 LEAs by concentrating classroom services only on the educationally deprived children. Three other LEAs could have improved services by providing adequate inservice training to title I teachers and aides.

READING SERVICES VARIED

LEAs used various remedial reading approaches, ranging from use of reading materials only to the combined use of reading materials and audiovisual equipment, such as filmstrip readers, projectors, and tape recorders. In the latter case, use of sophisticated reading equipment was emphasized. Also, each LEA used different reading materials.

The composition of title I teaching staffs varied. Ten LEAs used both teachers and teacher aides, three used only teachers, and two used only teacher aides. Also, three LEAs held title I classes with the regular reading classes, eight held them in separate classrooms, and four used a combination of these methods.

Most LEAs expressed the need for more title I funds to hire additional teachers and aides and to generally become more sophisticated in providing special assistance to educationally deprived children. However, six LEAs could have improved the quality of their title I reading services within available resources, as discussed below.

Need to concentrate classroom services on educationally deprived children

OE regulations and guidelines require that title I services be concentrated on educationally deprived children. At 16 title I schools involving 6 LEAs both title I and non-title-I children received remedial reading instruction from teachers and aides employed solely for title I purposes, thus depriving the title I children from receiving maximum instructional services.

Illustrative of this situation was a small elementary school which used a title I teacher aide to assist the school's regular fifth and sixth grade reading teacher. The aide assisted both title I and non-title-I students. The regular reading classes averaged 29 students, 9 of whom were title I remedial reading students. In one of these

classes, the regular reading teacher worked with 8 non-title-I students on oral reading in a corner of the classroom, while the aide helped the remaining 11 non-title-I and 7 title I students with their regular assignment in a reading exercise book. Most requests for the aide's assistance came from the non-title-I students, and she spent about one-third of her time helping these students.

At the other three elementary schools under this LEA, we also observed that both title I and non-title-I students were served by title I teacher aides in regular classrooms under the supervision of regular reading teachers. Consequently, title I students were deprived of maximum services to the extent that the teacher aides assisted non-title-I students. The SEA's annual program review in 1973 had also disclosed this deficiency, and the LEA later told the SEA that it would make every effort to insure that classroom aides worked directly with only title I participants.

A title I official at one of the six LEAs said that the use of title I aides to instruct non-title-I students is acceptable because it gives the regular classroom teachers more time to work with title I students. According to OE officials, such a practice is subject to abuse because the teachers tend not to spend this time working with title I students. They believe that title I teachers and aides should work with only title I students because title I is intended to supplement the LEA's locally funded school program.

Need to strengthen inservice training

Title I regulations and guidelines require that LEAs provide education aides and the professional staff with adequate inservice training. The reading services provided to title I students at three LEAs could have been improved had adequate inservice training been provided to project staff members on such matters as (1) the intent and requirements of the title I program, (2) effective use of teacher aides, (3) remedial reading, and (4) special education techniques and approaches.

We interviewed all eight of the title I teachers and aides in four of the five schools under one LEA. All said they had received no inservice training related to title I. Four of the six aides also said they had no formal training or experience in teaching reading or remedial reading. The LEA project director, acknowledging that inservice training had been limited, said he had proposed

that title I aides be given release time during school hours to receive training from the school's staff. He also said that he had informed the SEA that plans were being made to establish an LEA-wide inservice training program to stress the goals, objectives, and evaluation results of title I projects and that a separate inservice program would be planned for all title I personnel. SEA officials told us that they try to stress the importance of training but that they prefer not to impose too many requirements because of LEAs' power and independence.

At another LEA a title I official acknowledged the need to strengthen the inservice training program for title I teachers and aides and said that plans were being made to do so. Records were not available at the third LEA to show the amount of inservice training provided. However, on the basis of our discussions with teachers and our classroom observations, it appeared to be minimal.

CONCLUSION

Title I reading services need to be improved by concentrating services on educationally deprived children and by providing quality inservice training to title I teachers and aides.

RECOMMENDATION TO THE SECRETARY OF HEW

The Secretary should direct OE to work closer with SEAs and LEAs to help insure that (1) title I reading services are concentrated on educationally deprived children and (2) quality training is provided to title I teachers and aides.

AGENCY COMMENTS

HEW concurred in our recommendation and said that:

--OE will continue to place more emphasis on strengthening the States' needs assessment processes and practices and, through technical assistance, provide more guidance in identifying and approving only those projects that are geared toward concentrating title I services on educationally deprived children.

--OE will, through its various contacts with SEAs and LEAs, emphasize that quality training for title I teachers and aides leads to improved instruction for educationally deprived children.

CHAPTER 6

NEED FOR BETTER DISSEMINATION OF INFORMATION ON EXEMPLARY ACTIVITIES

To increase the effectiveness of title I and other educational activities, OE, the SEAs, and the LEAs are required to disseminate information on exemplary activities to teachers and administrators. The General Education Provisions Act (20 U.S.C. 1231a) provides that the Commissioner of Education:

> "* * * prepare and disseminate to State and local educational agencies and institutions information concerning applicable programs and cooperate with other Federal officials who administer programs affecting education in disseminating information concerning such programs * * *."

Before March 1972 OE made little effort to identify and disseminate such information. Since then OE has implemented procedures for screening potentially exemplary activities. Also, in fiscal year 1975, OE started a program designed to identify, collect, validate, and package data on exemplary activities. Although OE has not yet developed a systematic plan for disseminating such data, it plans to do so.

None of the LEAs and only three of the SEAs had formal systems for disseminating information on exemplary title I activities. Officials at 9 SEAs and 14 LEAs indicated they had received insufficient training and information from OE or SEAs about such activities.

We believe a formal dissemination system should provide for

--identifying and collecting data on potential exemplary activities,

--validating the quality of this data,

--screening the activities to identify those which are exemplary, and

--packaging and distributing data about the exemplary activities.

DISSEMINATION REVIEW PANELS

An OE headquarters official told us that before March 1972 OE disseminated information about exemplary activities on an ad hoc basis through its program personnel and that OE had never disseminated a large amount of information. In March 1972 OE established a dissemination review panel to judge which projects submitted as candidates for the designation of exemplary were in fact exemplary.

There have been three dissemination review panels. The first was established to "develop and apply criteria for the selection of exemplary or validated OE-supported programs or practices before their dissemination." This OE panel held six meetings during April and May 1972 and then became inactive.

In September 1972 a second panel was formed. This panel, cochaired by officials of HEW's National Institute of Education and OE, was to provide systematic quality control of programs and projects designated by the Institute and OE as exemplary. The OE cochairman said that in 1973 the panel judged 12 title I projects to be exemplary. Information about these projects was disseminated at a 1973 Education Fair sponsored by OE.

The Education Amendments of 1972 (Public Law 92-318) transferred OE's education research function and dissemination-of-information unit to the Institute. In July 1973 the Assistant Secretary for Education said that the Institute had the major responsibility for developing and disseminating educational materials and practices, and that OE was to disseminate information on its programs and help the Institute disseminate information. In August 1973 the Assistant Secretary discontinued the joint dissemination review panel and reestablished the OE panel, which had its first meeting in October 1973. The panel was "to review and approve all educational products and materials proposed for dissemination." An OE headquarters official told us that in early 1975 the Assistant Secretary for Education created another National Institute of Education and OE panel.

SEA AND LEA DISSEMINATION SYSTEMS

None of the LEAs and only three of the SEAs had formal systems for disseminating information on exemplary projects. At three SEAs which did not have formal systems, officials said they lacked funds or staff. At two LEAs officials said the SEAs were responsible for disseminating information to LEAs; however, their SEAs did not have formal dissemination systems.

Officials at 12 LEAs believed disseminating information on exemplary projects was a good idea and wanted to participate. Officials at three LEAs expressed doubt about the usefulness of such information because they questioned whether a project that worked in one LEA would work in another.

At 9 SEAs and 14 LEAs officials indicated they had received insufficient information and training from OE or the SEAs concerning dissemination. One LEA title I director said the lack of information on exemplary projects was one of the title I program's real weaknesses. He said the LEA would like to see and read about successful projects because such information might help to better plan and manage projects.

At five SEAs and nine LEAs officials said the information they received on exemplary projects was too general to be of much value. One SEA official said methodologies must be developed to provide LEAs not only with general information about exemplary projects but also with opportunities to see, participate in, and understand the procedures used in developing and implementing such projects. One LEA had received lists of projects which other LEAs had defined as exemplary. These lists did not elaborate on the procedures, techniques, or evaluations of the projects but only stated that other State and LEA personnel could visit the projects to observe and evaluate them.

OE ACTION AND FUTURE PLANS

In addition to establishing the dissemination review panel, OE recently started a new Packaging and Field Testing Program designed to identify, collect, validate, package, and disseminate data on exemplary activities. An OE headquarters official told us that, although a systematic plan for disseminating such data had not been developed as of February 1975, the Commissioner of Education had directed OE's Deputy Commissioner for School Systems in November 1974 to develop one. In the interim the responsibility for distributing data still rests with the program personnel. For fiscal year 1975, OE requested $3.5 million for its Packaging and Field Testing Program.

Late in the fall of 1973, an OE contractor identified six exemplary projects--five title I funded and one State funded. The contractor validated and packaged for dissemination data on the projects (three in reading and three in reading and math). OE began implementation of the Packaging and Field Testing Program by selecting 17 States to test

the packages in 1 or more LEAs. Testing began in August and September 1974, and the contractor was to be available to assist the LEA when necessary. OE hired another firm in June 1974 to evaluate the results of the field testing. As of October 1975, the packages were being revised as a result of the first of 2 years of field testing.

In July 1975 OE started another identification and packaging study to include educational products and practices as well as total approaches. The study was to package information on four exemplary bilingual projects and to identify up to eight exemplary compensatory education projects and package information on them. OE expected that most, if not all, of the compensatory projects will be title I.

Also in fiscal year 1975, OE started recruiting and training a professional staff to carry out its Packaging and Field Testing Program. The staff is to "implement a continuing process of identification, validation, analysis, synthesis, packaging, installation, technical assistance, monitoring, modification, and evaluation."

OE has sponsored other activities to identify exemplary activities. In June 1974 OE awarded a contract for a firm to study and analyze State title I reports for fiscal years 1971-74 to identify successful approaches. The firm was also to develop procedures for States to use in collecting data on projects and a standardized reporting format. In our opinion, this is essential if exemplary projects are to be identified.

In January 1974 OE asked State title I coordinators to identify exemplary projects in their States using OE criteria. Descriptions of these projects were reviewed by OE regional and headquarters personnel and then were submitted to the OE dissemination review panel for approval. As of June 30, 1975, 30 title I projects had been validated by OE as being exemplary, their descriptions had been made available to State title I coordinators, and other projects were being validated.

CONCLUSIONS

The effectiveness of the title I program has been limited by the lack of a formal system for disseminating information on exemplary activities. OE has now developed a system for identifying, collecting, validating, screening, and packaging data on exemplary activities which should help make useful data available for dissemination to interested parties. However, the effectiveness of the title I program

will be limited until a systematic plan has been developed for disseminating this data.

Many SEAs and LEAs would have benefited from additional guidance and training regarding a dissemination system. Such guidance and training should increase the effectiveness of the title I program by encouraging SEAs and LEAs to establish systems for disseminating information on successful projects to all concerned.

RECOMMENDATIONS TO THE SECRETARY OF HEW

The Secretary should direct OE to:

--Develop a plan at an early date for disseminating information on exemplary activities.

--Assist the LEAs and SEAs in establishing or improving their dissemination systems by giving them additional guidance and training.

AGENCY COMMENTS

HEW concurred in our recommendations and said that:

--OE is formulating strategies and providing for the dissemination and utilization, on a national basis, of validated exemplary educational projects as approved by a special OE/National Institution of Education dissemination review panel which was created in early 1975 by the Assistant Secretary for Education. (This fourth panel was formed in April.) As a consequence, a Dissemination and Utilization group has been established in OE's Bureau of School Systems. It has (1) developed preliminary plans for technical assistance, (2) established working communications with other HEW units involved in specialized educational programs, (3) reviewed literature, (4) interviewed others who are knowledgeable about dissemination, (5) begun operational linkages for dissemination with HEW's regional offices, and (6) informed SEAs and LEAs that they will be closely involved in the planning and operational phases.

--OE will encourage SEAs directly and LEAs indirectly to duplicate many of the practices developed on the Federal level and, through more direct technical assistance in terms of training and working communication, SEA and LEA dissemination practices will be strengthened.

CHAPTER 7

NEED TO IMPROVE PARENTAL INVOLVEMENT

The General Education Provisions Act (20 U.S.C. 1231(d)) authorized the Commissioner of Education to require parental involvement in those federally financed programs he felt would be enhanced by such involvement. On October 14, 1971, OE published regulations requiring LEAs to organize LEA-wide parent advisory councils for title I. These regulations provide that parents be involved in planning, developing, operating, and evaluating title I projects. OE guidelines state that the goal of parental involvement should be to build the parents' capabilities of working with schools to support their children's well-being, growth, and development.

Almost all the LEAs needed to increase the involvement of parents of title I children in their programs. Maximizing parental involvement could help to increase the program's responsiveness to the needs of the children.

PRESENT PARENTAL INVOLVEMENT

Although all 15 LEAs had established parent advisory councils and generally had some parental involvement, they had not fully met the requirements. Thirteen of the 15 LEAs needed to extensively increase parental involvement in planning, developing, operating, and evaluating their title I projects.

Of the nine LEAs that had data with which we could compare planned frequency with actual frequency of parent advisory council meetings, seven held all the meetings they had planned in school year 1972-73, one held eight of nine planned meetings, and one held one of three planned meetings. Some parent advisory councils never met or met infrequently. When meetings were held, parent attendance and participation was generally limited. For the seven LEAs that maintained records on attendance at council meetings, the average rate of attendance was 50 percent for title I parents. At one LEA only one parent attended each of the last two council meetings. We observed at one meeting that the parents had no real input and seemed ill at ease. The chairperson of another council characterized the council as a "rubber stamp" for management.

Some LEAs needed to increase their efforts to get parents involved. For example, one LEA's only form of parental involvement was the parent advisory council, and the LEA made little effort to get parents other than those

on the council involved in project activities. At another LEA the council did not have a chairperson and the members made little input to the program. The title I director said the members did not understand the objectives and requirements of title I. Title I regulations require that the LEA provide the council with the information it needs to function effectively.

Some LEAs had attempted to involve the parents of title I children in their programs but had failed because they were unable to overcome parental disinterest. For example, one LEA hired a parent activity coordinator to promote parental interest in the program, but he had only limited success. Another LEA seemed to have made sufficient efforts to increase parental involvement, but school officials at two of the four schools we visited said they had experienced extreme difficulty in getting parents involved.

One LEA successfully increased parental involvement. Before school year 1972-73, this LEA had poor parental involvement, primarily because it had made only limited efforts to stimulate parental interest. In preparing for the 1972-73 school year, the LEA intensified its efforts by making home visits, submitting the title I application to the parent advisory council for its review and approval, and asking the council to become involved in assessing needs. Parent interest and involvement in the LEA's program increased.

LEA officials gave different reasons for the lack of parental involvement, including lack of time and parental apathy. One official said the trend toward apathy was due to parents'

--distance from school,

--lack of interest since court-ordered integration,

--resentment of the Federal Government's involvement in local affairs, and

--educational deprivation and their resulting lack of appreciation for children's academic needs.

SEA and OE regional officials generally believed LEAs needed to extensively increase parental involvement in their title I programs. SEA officials made several suggestions on how to do this, such as constant surveillance by the SEA or payments to parents for attending meetings. One SEA official thought LEAs should provide more inservice training on how to get parents involved. Another SEA official

suggested that OE change its guidelines to require that a parent advisory council be organized at each target school instead of requiring only one council for an entire LEA because:

--Parents are concerned primarily with their own children rather than all children in the LEA.

--Some parents may feel out of place among the professionals at an LEA-wide meeting.

--LEA-wide meetings are too far removed from the particular school where a parent has his or her child.

At the seven HEW regional offices included in our review, title I officials told us that OE's annual program reviews at selected SEAs and LEAs had frequently disclosed inadequate parental involvement. Examples of the types of weaknesses OE identified follow.

--Parents were denied essential information about the program and did not receive copies of the law or regulations.

--Parents of nonpublic school children were not involved in title I activities.

--LEA officials did not sufficiently try to assist the parent advisory council in carrying out its duties.

One OE regional program official told us that about all OE can do to improve parental involvement is continue to emphasize to SEAs the need to intensify their monitoring of the LEAs' efforts.

CONCLUSIONS

Increased parental involvement was needed at 13 of the 15 LEAs to increase the potential for program impact on the target children. Although all the LEAs had established parent advisory councils in accordance with program requirements, in almost all instances their effectiveness was questionable. The limited parental involvement appeared to be due to the lack of a concerted effort by the LEAs to involve parents or the inability to overcome parental disinterest.

RECOMMENDATION TO THE SECRETARY OF HEW

The Secretary should direct OE to continue to emphasize to the SEAs the need to review, during their monitoring visits, LEAs' efforts to get parental involvement and, where necessary, to assist LEAs in these efforts.

AGENCY COMMENTS

HEW concurred in our recommendation and said that:

--The proposed title I regulations governing parental involvement require greater participation on the part of parents through the mandate that councils be established in title I schools in addition to the district level as now required. As soon as final clearance is received on the new regulations, OE will revise its parent handbook and disseminate it to appropriate audiences.

--Under its State Information Sharing project, OE is gathering information on exemplary parental involvement components from local title I projects in 13 States. Information on these projects, which were selected by the SEAs, will be disseminated nationally through oral presentation at regional meetings and through prepared documents. The parent involvement State Information Sharing project is a continuing effort to provide technical assistance through local, State, and regional meetings and through area review and monitoring of title I projects.

--In summary, the proposed regulations will form a basis for additional emphasis on parental involvement, will specify the nature and extent of such involvement, and will enable OE to focus more specifically on parental involvement as part of the State monitoring visits. The revised parent handbook and the results of the State Information Sharing activity will enable OE to give specific guidance to LEAs on how to effectively involve parents and to SEAs on what to look for in monitoring LEAs and how to assist them in improving parental involvement.

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These comments as well as those on pages 16, 20, 27, and 30 show that OE plans to rely heavily on its annual State program reviews as a means to implement our recommendations. We did not examine this activity in depth during this review but, because of the extent to which OE intends to rely on annual reviews, we will consider examining this activity in future audit work.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20201

August 5, 1975

Mr. Gregory J. Ahart
Director, Manpower and
Welfare Division
General Accounting Office
Washington, D.C. 20548

Dear Mr. Ahart:

The Secretary asked that I respond to your request for our comments on your draft report to the Congress entitled, "Assessment of Reading Activities Funded Under the Federal Program of Aid for Educationally Deprived Children."

We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,

John D. Young
Assistant Secretary, Comptroller

Enclosure

COMMENTS OF THE DEPARTMENT OF HEALTH, EDUCATION AND WELFARE ON THE COMPTROLLER GENERAL'S REPORT TO THE CONGRESS ENTITLED "ASSESSMENT OF READING ACTIVITIES FUNDED UNDER THE FEDERAL PROGRAM OF AID FOR EDUCATIONALLY DEPRIVED CHILDREN" -- April 25, 1975, B-164031(1)

GAO Recommendation

The Secretary of HEW should direct OE to:

--Develop procedures for implementing the new program evaluation provisions mandated by the Education Amendments of 1974, to include in the uniform reporting system to be established information on (1) the number of students achieving at, below, and above grade level and (2) whether a sample of former Title I students are retaining the gains made while in the program.

--Make a concerted effort to get SEAs, where necessary, to strengthen their monitoring of Title I projects to enable them to better determine project strengths and weaknesses.

Department Comments

We concur --

The Office of Education is in the process of developing evaluation model(s) for use at the local level, and a common reporting format for use at local and State levels. These procedures will accommodate use of different reading tests among LEAs. The successful implementation of the common reporting format will provide annual information on the number of participants who are achieving at, below, or above the level appropriate for their ages. In addition, OE is mounting a national study, beginning July 1, 1975, to ascertain the sustaining effects of compensatory education programs on participants. This study will also report on the retention of gains made by Title I students as well as on the number of educationally disadvantaged children who are and who are not receiving special educational services. As this study progresses and information is gathered the feasibility of including the longitudinal evaluations on a sampling basis recommended in item (2) as a part of the reporting system will be examined.

With respect to providing assistance in strengthening the SEA's monitoring of Title I projects, the Office of Education program review teams, during their annual review of each State's Title I administration, critique the process used to identify the particular educational needs of participants, the relationship of participant needs to performance objectives and program design, and the monitoring and technical assistance offered by the State agency. We plan to continue this procedure and to continue the practice of, both verbally and in writing, assessing the effectiveness of the State's effort in the areas observed, recommending modifications where necessary, and requesting the State to communicate to us the action it takes or plans to take to implement recommendations made.

GAO Recommendation

The Secretary of HEW should direct OE to:

--Give special attention during its State program reviews to any problems that the LEAs are having in making and documenting needs assessments.

Department Comments

We concur --

It has been the established practice over the past five years for the OE monitoring team, during its annual State program review, to review the needs assessment activities at local and State levels, to recommend improvements as warranted, and to offer OE's technical assistance to the SEA in this area.

It should be noted that OE can respond to specific problems of LEAs only in and through the SEA which is responsible for Title I administration. Many such requests are made each year and are responded to as appropriate in each case. Under its State Information Sharing project OE is presently gathering information on successful needs assessment components from local Title I projects in fourteen States. These projects were selected as exemplary by the SEA and will be disseminated nationally in the coming year as a part of OE's continuing effort to give technical assistance to SEAs and LEAs. It is felt that the new regulations governing Title I will also be of much help with this problem. Needs assessment was only referred to in the old regulations. The new regulations will outline more specifically the procedures to be used in documenting the educational needs of children

to be served. Thus, the State agencies will have clearer guidance on what information to require LEAs to provide in support of their needs assessment and OE review teams will be able to focus on both the State's implementation of the regulations as well as offering technical assistance to States and LEAs through the State Information Sharing vehicles.

GAO Recommendation

The Secretary of HEW should direct OE to:

--Emphasize to the SEAs the need for LEAs to document the basis for selecting program participants to insure that the children whom Title I is intended to serve are being served.

--Clarify its policy regarding serving the most educationally deprived as it relates to the selection and retention of students in the program.

Department Comments

We concur --

The necessity for adequate documentation of the basis for selecting participants has been addressed during the annual State program reviews as well as through OE technical assistance provided at State and regional conferences. The OE annual State program reviews will continue to emphasize to SEAs the need for LEAs to document the basis for participant selection. The State Information Sharing system will make available to States and through them to local agencies, effective needs assessment practices, including the utility of appropriate documentation of the bases for participant selection. Furthermore, it is expected that the new regulations will specify the local needs assessment process to LEAs. In addition, the OE review team will monitor the SEA and selected LEA implementation of the needs assessment procedures.

To clarify its policy regarding serving the most educationally deprived as it relates to the selection and retention of students in the program. OE will continue to work with the SEAs both through the annual program reviews and through specific technical assistance visits to clarify even further the existing policy of providing Title I services to children identified through educational needs assessment as being in greatest need until such children are achieving at a level appropriate for their age or until they are passed to a grade in which Title I services are not available. While not a new policy, it will be more specifically covered in the new regulations which will be distributed to and reviewed with SEAs by OE and reviewed with LEAs by their SEAs.

GAO Recommendation

The Secretary of HEW should direct OE to:

--Expand its efforts in working with SEAs and LEAs to help insure that (1) Title I reading services are concentrated on educationally deprived children and (2) quality training is provided to teachers and aides employed in the Title I program.

Department Comments

We concur --

Reading instruction appears to continue to be the educational need most frequently identified among educationally deprived children. Of course, only educationally deprived children in project schools with need for reading instruction are entitled to Title I reading services. Therefore, OE will continue its effort as it works with SEAs directly and LEAs indirectly through program reviews, conferences, and workshops to emphasize the requirement of providing services for meeting high priority needs. OE will continue to place more emphasis on strengthening the States' needs assessment processes and practices and, through technical assistance, provide more guidance in identifying and approving only those projects that are geared toward concentrating Title I services on children who have been identified as being educationally deprived.

OE will also, through its various means of interacting with State and LEAs, emphasize the relationship of quality training provided to teachers and aides employed in the Title I program with improvement of instruction among educationally deprived children.

GAO Recommendation

The Secretary of HEW should direct OE to:

--Expedite the development of a systematic plan for disseminating information about exemplary activities.

--Assist the LEAs and SEAs in establishing or improving their dissemination systems by providing them with additional guidance and training.

Department Comments

We concur --

OE is in the process of formulating strategies and providing for the dissemination and utilization, on a national basis, of validated quality exemplary educational products as approved by a special Office of Education/National Institute of Education Dissemination Review Panel which was created in early 1975 by the Assistant Secretary of Education. As a consequence, a Dissemination and Utilization group has been established in OE's Bureau of School Systems. It has developed preliminary plans for effective technical assistance, established working communications with other HEW units involved in specialized educational programs, reviewed literature, and carried out interviews with others who are knowledgeable about dissemination. Operational linkages for dissemination have begun with the Office of Education's Regional Offices after discussions with Regional Commissioners and their Office of Education program officers. Some State and local educational agencies have communicated with the Bureau of School Systems concerning their roles in the planned dissemination processes and they (and others later) have been informed of their close involvement in planning and operational phases.

OE's concept and practice of dissemination and utilization requires active participation with and preparation for educational institutions adopting, installing, and working with the exemplary projects and materials. This is translated as technical assistance and channeled through OE headquarters, the Regional Offices, and a contracted Field-Based Technical Assistance Unit, working with and coordinating with SEAs, LEAs, and other educational groups and individuals. This technical assistance, which is an integral part of the dissemination/implementation process, will be designed to help successfully integrate the disseminated project into the institutions' regular programs of learning in all stages of installation, and so satisfy the school's educational needs.

To assist the LEAs and SEAs in establishing or improving their dissemination system OE will encourage SEAs directly and LEAs indirectly to duplicate many of the practices developed on a Federal level and, through more direct technical assistance in terms of training and working communication by Title I and Title III of ESEA, State and local educational agencies' dissemination practices will be strengthened.

GAO Recommendation

The Secretary of HEW should direct OE to:

--Continue to emphasize to the SEAs the need to review the parental involvement efforts of LEAs during their monitoring visits and, where necessary, assist the LEAs in any way possible to get increased involvement.

Department Comments

We concur --

The new regulations governing parent involvement require greater participation on the part of parents through the mandate that councils be established in Title I participating schools as well as at the district level. The development of procedures for implementation of parent involvement at the school building and district level will necessitate LEA personnel becoming more involved with an increased number of parents. As soon as final clearance is received on the new regulations, the Office of Education will revise the parent handbook and disseminate it to appropriate audiences.

Under the State Information Sharing project, OE is presently gathering information on successful parent involvement components from local Title I projects in thirteen States. These exemplary projects were selected by the SEAs and will be disseminated nationally through oral presentation at regional meetings and through prepared documents. The parent involvement State Information Sharing project is a continuing effort to provide technical assistance through local, State and regional meetings and through area review and monitoring of Title I projects.

In summary, the new regulations will form a basis for additional emphasis on parent involvement, will specify the nature and extent of such involvement, and will enable OE to focus more specifically on parent involvement as part of the State monitoring visits. The revised parent handbook and the results of the State Information Sharing activity will enable OE to give specific guidance to LEAs on how to effectively involve parents and to SEAs on what to look for in their monitoring of LEAs and how to assist their LEAs in improving parent involvement.

GAO note: The last paragraph of HEW's comments dealing with general observations has been deleted. These general observations have been considered and minor changes have been made in the body of the report.

PRINCIPAL OFFICIALS OF THE DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE RESPONSIBLE FOR ACTIVITIES DISCUSSED IN THIS REPORT

	Tenure of office	
	From	To
SECRETARY OF HEALTH, EDUCATION, AND WELFARE:		
David Mathews	Aug. 1975	Present
Caspar W. Weinberger	Feb. 1973	Aug. 1975
Frank C. Carlucci (acting)	Jan. 1973	Feb. 1973
Elliot L. Richardson	June 1970	Jan. 1973
ASSISTANT SECRETARY (EDUCATION):		
Virginia Y. Trotter	June 1974	Present
Charles B. Saunders, Jr. (acting)	Nov. 1973	June 1974
Sidney P. Marland, Jr.	Nov. 1972	Nov. 1973
COMMISSIONER OF EDUCATION:		
Terrel H. Bell	June 1974	Present
John R. Ottina	Aug. 1973	June 1974
John R. Ottina (acting)	Nov. 1972	Aug. 1973
Sidney P. Marland, Jr.	Dec. 1970	Nov. 1972